



# THE JOURNEY TO **ZERO HARM**

Group EHS 3 Year - Strategic Plan





# Introduction and welcome from Claudio Veritiero, CEO

The Group Environment, Health and Safety (EHS) Strategy reflects my and the company's commitment to protecting our people and the environment when working at or visiting one of our Port locations.

In 2022 we embarked on a 3 year EHS journey setting out a clear strategic direction focussed around a vision, goal and eight themes. This plan details the progress we have made and how we will continue **'The Journey to Zero Harm'**.



**Claudio Veritiero**  
Chief Executive Officer





## Our vision

To ensure we protect our people and environment.

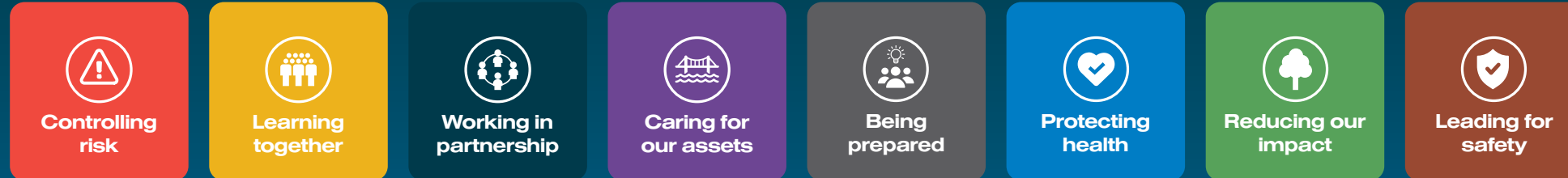


## Our goal

We work together to ensure our operations are managed effectively to target zero harm.



### Eight Strategic Themes



It is now time to reflect on our success and continue 'Our Journey to Zero Harm'.

THE JOURNEY TO  
**ZERO HARM**

This strategic plan which has been endorsed and approved by me, my leadership team and our investors provides an overview of the progress we have made and sets out the strategic deliverables we have set ourselves for the next 3 years (2025-2028).

We want to create an EHS culture within Peel Ports where strong leadership, personal responsibility and commitment to excellence underpin the way we do business. Everyone has to play their part by working safely and protecting each other.

An important part of this strategic journey is to re-establish those all-important Golden Rules, these form a key part of our journey and are in place to keep you safe whilst on site. Please join me in making a personal commitment to follow the updated Golden Life Saving Rules which are incorporated into this plan as we strengthen our safety culture on the next part of the EHS journey for Peel Ports Group.

**Claudio Veritiero**  
Chief Executive Officer

Please take time to reflect on the progress we have made and collectively support the business in delivering on the important strategic objectives set out within this plan.

**Thank you**



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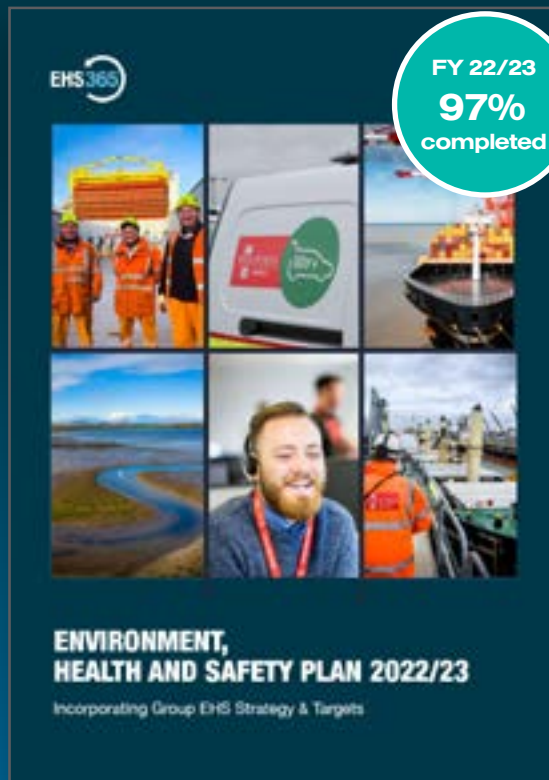
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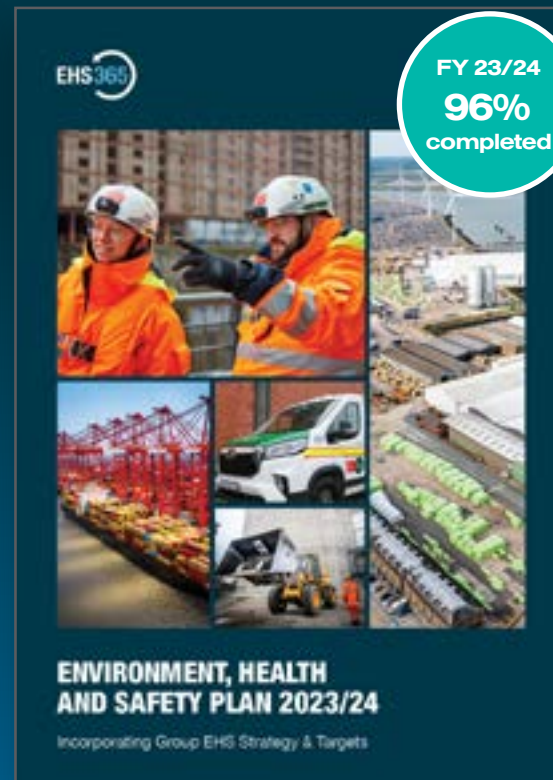


# The progress we have made so far.....

In 2022 we set out to deliver 10 strategic deliverables, aligned to these were >250 individual objectives delivered through annual plans.



FY 2022-2023



FY 2023-2024



FY 2024-2025

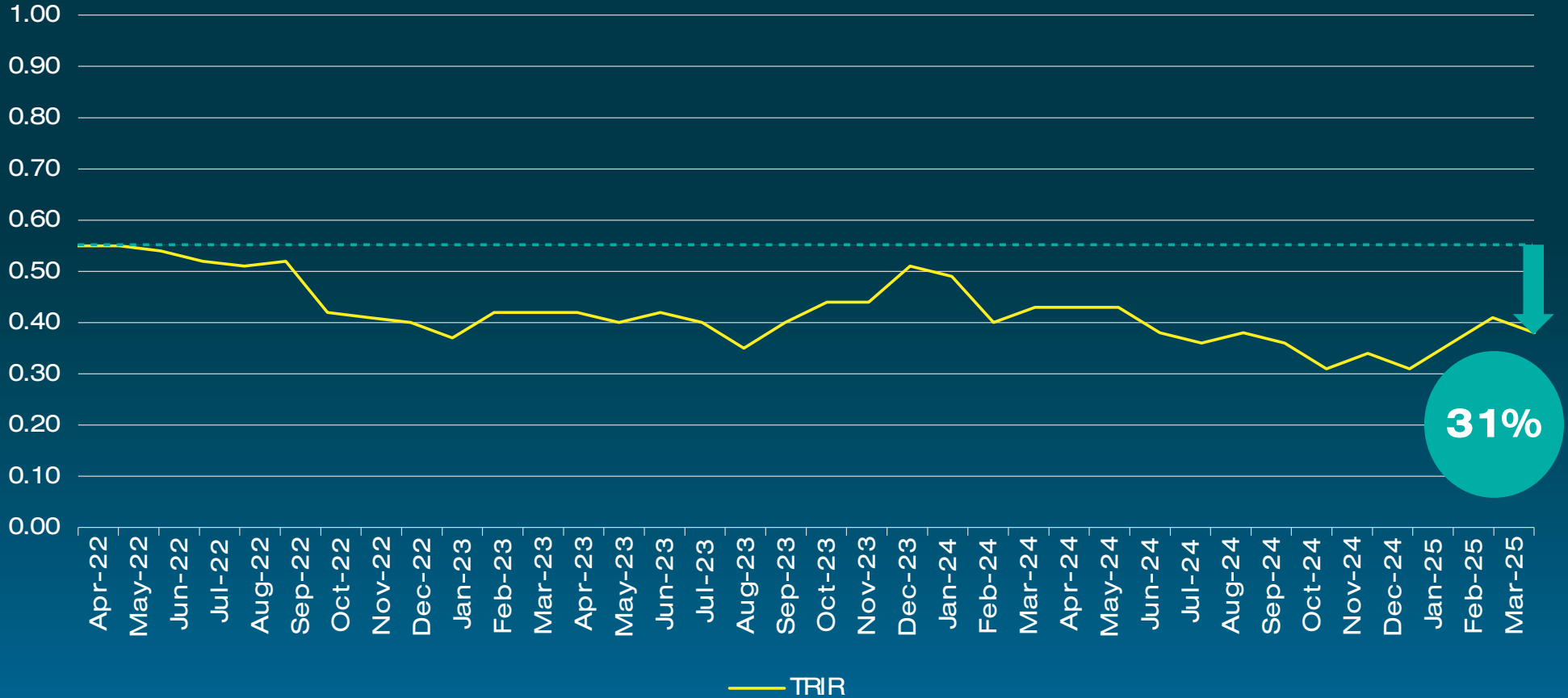
# Here are just a handful of our achievements

- Build on the current injury reduction rates – **44% reduction in All Injury Rate, 31% reduction in Total Recordable Injury Rate.**
- Embed and drive compliance through risk-based auditing and assurance – **Introduction of four level assurance framework.**
- Use our data and analytics to drive and measure our performance and effectiveness in Environment, Health & Safety (EHS) – **Production of >25 EHS data dashboards.**
- Work in partnership with others to deliver our EHS ambitions – **Appointment of a wider network of safety representatives.**
- Learn from our incidents and accidents to improve our EHS systems and controls – **Introduction of local and group Incident Review Panels (IRP).**
- Use innovation and technical advancements to reduce or eliminate risk – **New work management package for permit issue and management.**

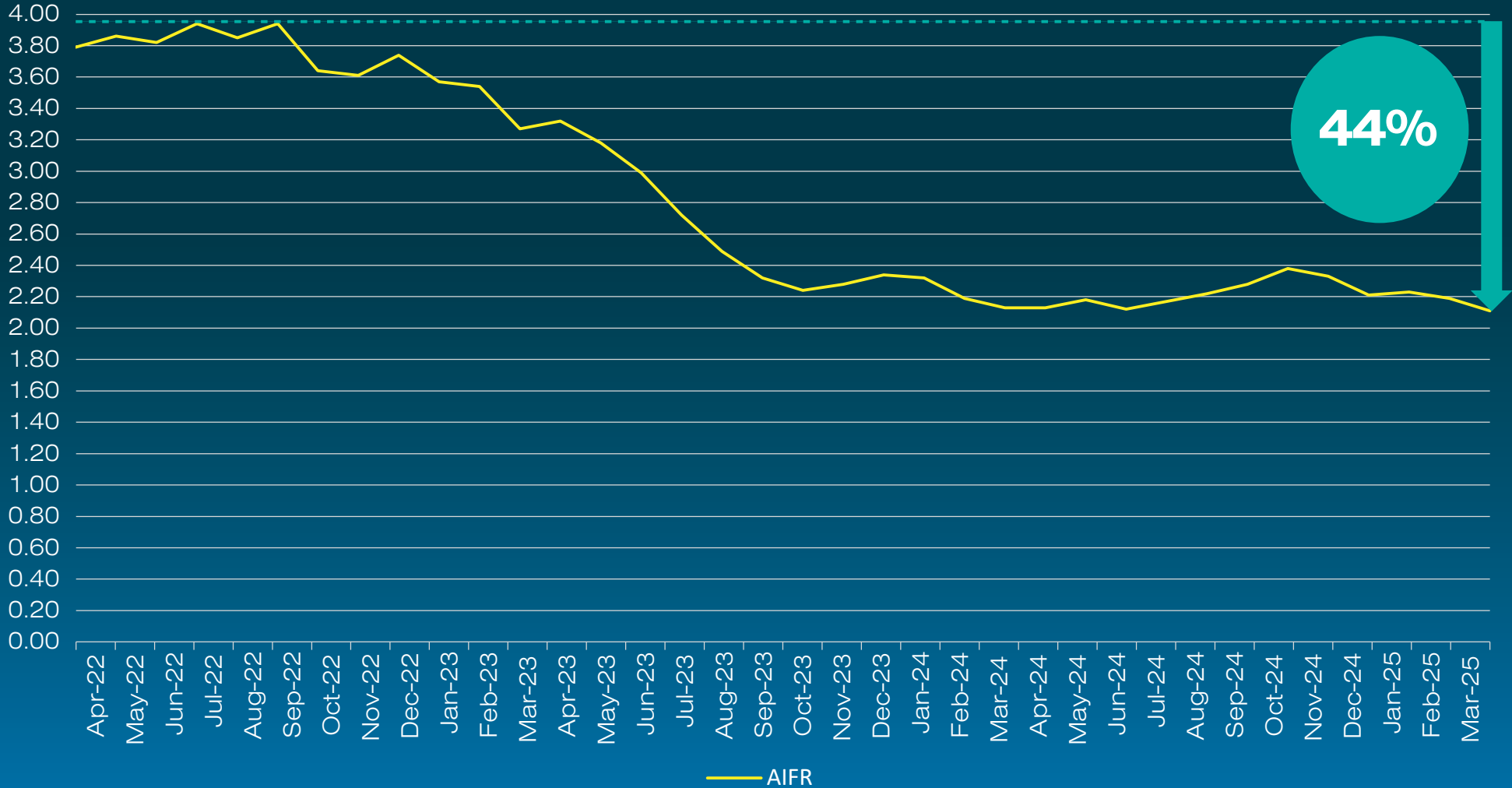
- Invest in our people through technical training and competence assessments for EHS – **Roll Out of 123 Safety & Me – Behavioural Safety Training Programme.**
- Enable our team leaders, supervisors and managers to effectively lead for EHS – **Daily Visible Felt Leadership (VFL) interaction on our sites.**
- Improve our safety risk management processes (RA/PTW etc) and safe systems of work – **Enhanced 'Safeguard 3' platform for risk assessment creation and management.**
- Create and manage an effective EHS management system to allow us to always find the right document at the right time – **Fully accessible EHS management system – creating one version of the truth!**
- Reduce the impact of our operations on people and the environment – **ISO 9001/14001/45001 accreditations achieved across our operational ports.**



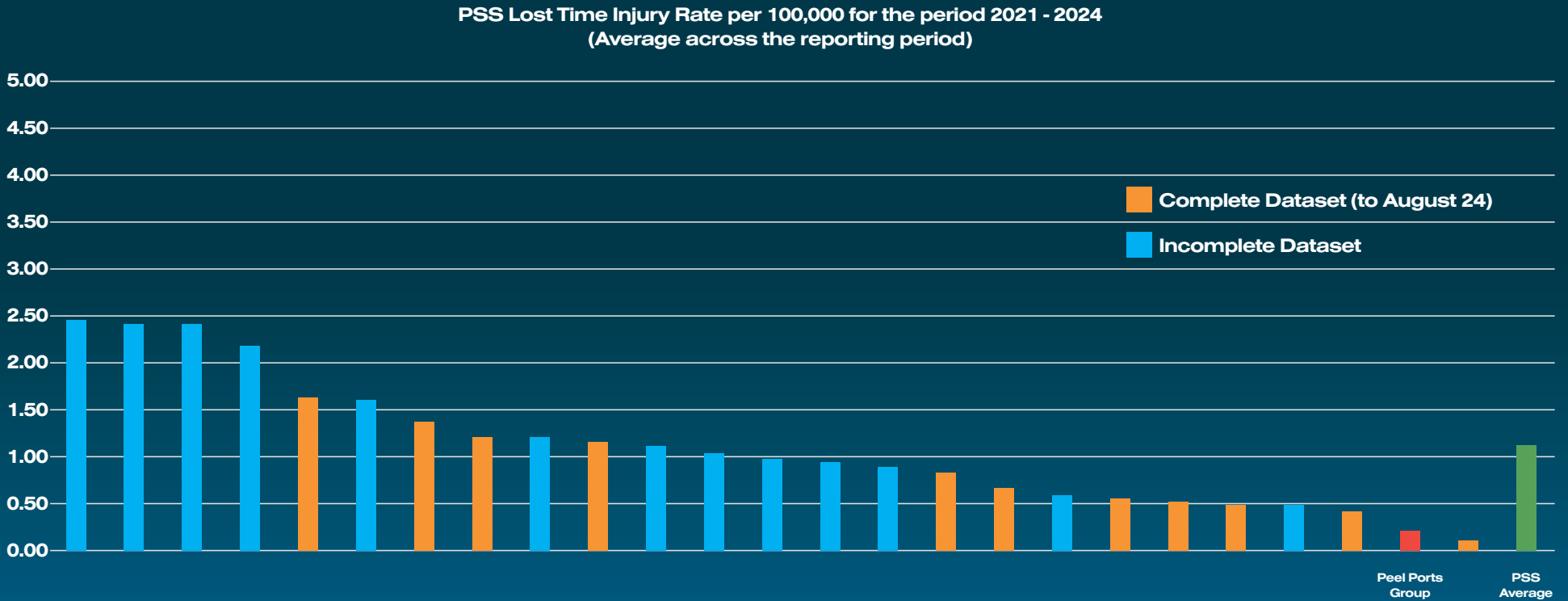
Peel Ports Group, Total Recordable Injury Rate (TRIR)  
12 - Month Rolling



Peel Ports Group All Injury Frequency Rate (AIFR)  
12 - Month Rolling

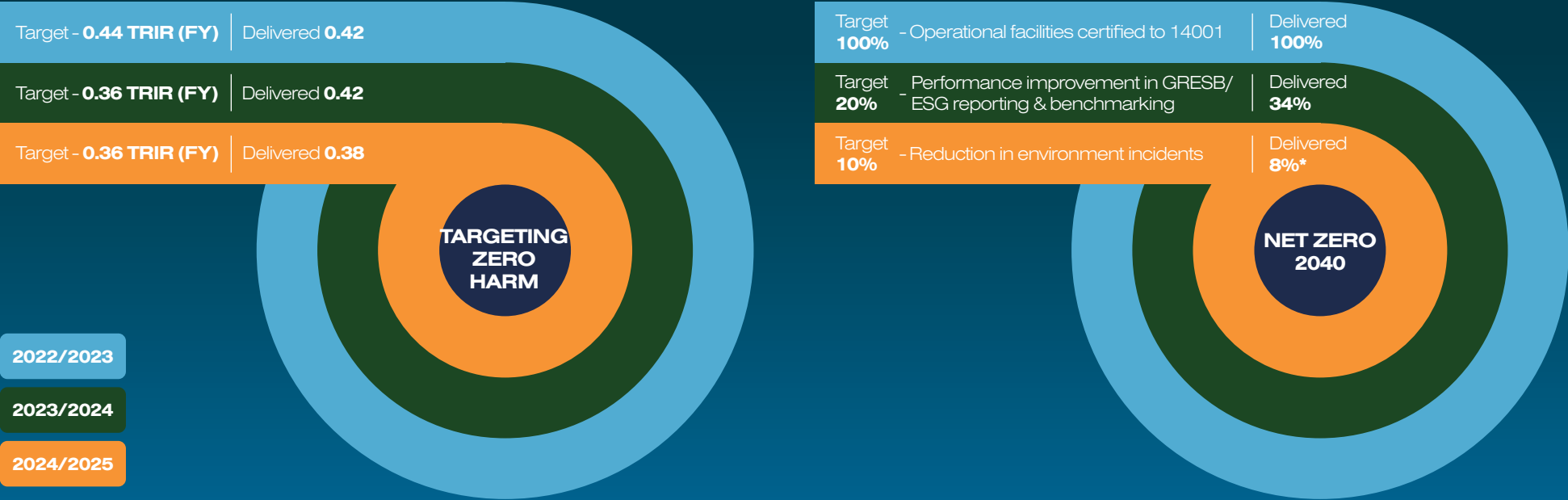


# Benchmarking



# Strategy target achievements for 2022-2025

Reflecting on the high level strategy targets we set ourselves for 2022 - 2025, great progress has been made in reducing our injury rates and also in delivering environmental improvements. The next phase of the strategy as detailed later in this plan will build further on these environment, health and safety (EHS) commitments with a revised set of EHS targets to deliver against.



GRESB (Global Real Estate Sustainability Benchmark) ESG (Environment, Social and Governance)

\* Increased focus on driving oil spill incident reporting has seen a 148% increase in oil spill reports in 2024/2025.



# A strategy built on values

## Values we live by

These values are the guiding principles which underpin the brand’s vision and purpose. As a business, our people live and breathe these every day.

By working **together**, we act in a **responsible** way to **enable** success and deliver **excellence**.

**Together :**  
We succeed through collaboration.

**Responsible :**  
We build on trust; we do things sustainably.

**Enable :**  
We enable success to benefit our world.

**Excellence :**  
We deliver through performance, service and innovation.





# THE JOURNEY TO ZERO HARM

## ENVIRONMENT, HEALTH AND SAFETY (EHS) STRATEGY 2025 - 2028

Continuing to deliver improvements in environment, health and safety (EHS) performance across our Ports is necessary to make our business stronger for the future. We need to recognise that we are on a journey, which is why the latest strategy spanning 2025 – 2028 is called '**The Journey to Zero Harm**'.

Building on the strong foundations from the delivery of the EHS strategy years 1 to 3, we embark on the journey through years 4, 5 and 6. Underpinning this journey is the launch of our Golden Life Saving Rules.



**Chris Ingham**

Group Environment, Health & Safety Director

The strategy is designed as a layered approach to maintain strength and drive performance.  
**Built around five key focus areas:**

**1 SYSTEMS, TOOLS AND PROCESSES**

**2 PEOPLE AND SKILLS**

**3 ASSURANCE**

**4 GOVERNANCE & LEADERSHIP**

**5 SAFETY CULTURE**



As we target continual improvement in our safety culture we recognise the need to build on the vision and goals with some new and expected core behaviours. The establishment of a commitment from us all to follow the rules, report without delay, protect each other and stop work are the foundations to working safely.

**Follow The Rules**

Always follow the health, safety and environmental rules. They are there to protect our people, plant and the environment in which we work.

**Report Without Delay**

Immediately report incidents and injuries which occur, this will ensure a timely investigation and event learning.

**Protect Each Other**

Ensure you are trained and competent to work in a safe manner, this will ensure we all go home safe.

**Stop Work Authority**

If you believe your safety, or the safety of others is being compromised you have the authority to intervene and stop the work.

# GOLDEN LIFE SAVING RULES

Our six Golden Life Saving Rules are designed to be easy to understand and clear in their expectations. Please ensure you follow them at all times when working at or visiting one of Peel Ports locations



**I Will Always** abide by pedestrian segregation and separation requirements



**I Will never** work at height without a suitable risk assessment and protection from a fall.



**I Will Never** stand or pass under a moving or suspended load.



**I Will Always** wear a seatbelt and obey site rules while driving



**I Will Always** wear a life jacket when working within 1.5 meters of an unguarded water's edge



**I Will Never** breach the Groups alcohol and drugs policy.  
**I Will Always** comply with all permit to work and Safe Systems of Work requirements  
**I Will Never** defeat interlocks and safety devices



Find out more  
[peelports.com/journeytozeroharm](https://peelports.com/journeytozeroharm)



# Your commitment

Asking for your signed commitment to follow our Core Behaviours and Golden Life Saving Rules supports our zero harm journey and will keep yourself and others safe when working at or visiting one of our Ports.



**Chris Ingham**  
Group Environment, Health & Safety Director



# THE JOURNEY TO ZERO HARM

THE STRATEGY 2025 - 2028



1 SYSTEMS, TOOLS AND PROCESSES



Embedding, Sustaining and Continual Improvement

- |   |   |                   |                     |  |
|---|---|-------------------|---------------------|--|
| 1 | Evolve and improve our work management package (ATW/PTW) and associated training and assurance requirements.  |                   |                     | Controlling risk                           |
| 2 | Deliver the improvements to risk assessment quality and management through full adoption of Safeguard 3 and ongoing development of improved safe systems of work. |                   |                     | Controlling risk                           |
| 3 | Undertake a review of SAP EHS functionality and associated power BI reporting to improve data capture, reporting and analysis.                                    |                   | Learning together   | Working in partnership                     |
| 4 | Identify innovative solutions to drive ongoing improvements in EHS performance (Group and local level).   | Protecting health | Reducing our impact | Controlling risk                           |
| 5 | Collaborate with IT and Tech365 to improve the digital process for managing change incorporating all business areas (Port Clusters and Group).                    |                   |                     | Controlling risk<br>Working in partnership |
| 6 | Maintain an effective EHS management system, ensuring continued cross business compliance.  | Protecting health | Reducing our impact | Controlling risk                           |
| 7 | Update and enhance EHS content on Peel Ports external facing website and explore opportunities to apply for EHS awards.   |                   |                     | Leading for safety                         |



2 PEOPLE AND SKILLS










Embedding, Sustaining and Continual Improvement

- |    |  |                     |                     |                        |                        |
|----|--|---------------------|---------------------|------------------------|------------------------|
| 8  | All business areas will ensure training and competency requirements for EHS are delivered and training matrices are maintained and updated.                            | Protecting health   | Reducing our impact | Learning together      | Controlling risk       |
| 9  | All personnel working for and on behalf of Peel Ports will receive a Group EHS and local induction.  | Reducing our impact | Learning together   | Controlling risk       |                        |
| 10 | We will ensure our employee's health and that of third-party labour is protected through effective surveillance, screening, case management and mandatory testing.     |                     |                     |                        | Protecting health      |
| 11 | We will launch and embed the New Golden Life Saving Rules. Employees, third party labour, visitors and contractors will be required to comply with these when on site. |                     |                     | Controlling risk       | Working in partnership |
| 12 | Core EHS training will be reviewed to ensure it meets business requirements and where possible is standardised across the Group to ensure consistency.                 | Controlling risk    | Learning together   | Leading for safety     |                        |
| 13 | We will develop our safety representative communities through training, active engagement and workplace assurance activities.  |                     | Leading for safety  | Working in partnership |                        |
| 14 | A review of our Group environmental compliance obligations will be undertaken to improve knowledge and skills across the organisation.                                 | Reducing our impact | Learning together   |                        |                        |

3 ASSURANCE



Embedding, Sustaining and Continual Improvement

- |    |  |   |
|----|--|---|
| 15 | We will enhance and improve our assurance framework working towards self-assured Port Clusters with Group EHS governance oversight.                      | <br>Controlling risk       |
| 16 | Group functions will be fully integrated into the assurance framework with a focus on targeted compliance audits.  | <br>Controlling risk       |
| 17 | Non-compliance will be analysed to identify patterns and poor performance. We will closely track and close actions and tasks raised through our systems. | <br>Controlling risk       |
| 18 | The Incident Review Panel (IRP) process will be reviewed and enhanced to drive continual improvements in investigation outcomes.                         | <br>Working in partnership |
| 19 | Evolve board and in business reporting to deliver continual improvements in EHS performance, compliance and associated governance.                       | <br>Leading for safety   |
| 20 | A set of new performance indicators will be developed to closely measure EHS performance and cultural development.                                       | <br>Leading for safety   |
| 21 | Group EHS will seek accreditation to ISO 9001, 14001 and 45001   | <br>Learning together    |



4 GOVERNANCE AND LEADERSHIP



Embedding, Sustaining and Continual Improvement

- |    |   |   |  |  |
|----|---|---|--|--|
| 22 | We will ensure we maintain compliance with all legal EHS requirements.  |  Protecting health |  Reducing our impact    |  Controlling risk         |
| 23 | Roles and responsibilities for EHS will be consistently allocated to all employees with targets and objectives clearly stated.                            |   |  |  Learning together        |
| 24 | All senior leaders will be required to attend a safety leadership course to support ongoing business cultural change.                                     |   |  |  Leading for safety       |
| 25 | Deliver an annual Group EHS/ESG conference focussed on key business themes.   |   |  Working in partnership |  Leading for safety       |
| 26 | Work closely with Port Skills and Safety (PSS) to improve cross sector engagement, improvements in EHS performance, benchmarking and information sharing. |   |  |  Working in partnership |
| 27 | Embed the Crisis Management and Business Continuity frameworks to improve business resilience.  |   |  |  Being prepared         |
| 28 | Undertake an independent evaluation of EHS systems, tools and processes.  |   |  |  Leading for safety     |

5 SAFETY CULTURE



Embedding, Sustaining and Continual Improvement

- |    |   |   |
|----|---|---|
| 29 | We will formally measure our safety culture through a workforce survey every 3 years.   |    |
| 30 | An internal safety leadership assessment will be conducted annually across the Port Clusters to measure performance improvement across a defined range of categories. |    |
| 31 | Our behavioural safety programme will be delivered to all operational business areas by 2027 and embedded into our induction process for new starters.                |     |
| 32 | We will undertake a detailed review of the Visible Felt Leadership (VFL) programme and evolve it to meet strategic EHS objectives.                                    |       |
| 33 | We will work with our procurement team to design a fit for purpose onboarding process for new contractors and define key EHS reporting metrics.                       |     |
| 34 | Working with our estates team we will develop an engagement framework to support improvements in safety culture across our ports.                                     |    |
| 35 | Exercising our Crisis Management and Business Continuity Plans will form a key component part of our assurance framework.   |    |



# Measuring our performance

To deliver continual improvements in EHS across Peel Ports Group we need to measure our performance. To align with the 3 year strategy we have chosen to identify five tier one zero harm metrics, these supported by ten tier two metrics will help drive performance.

Each metric will be measured throughout the 3 year strategy with updates provided at governance committees and through end of year reports.

## Our Zero Harm Metrics



Target Zero TRIR

Target Zero LTIR



% Recycled

% Recovered

% Disposal



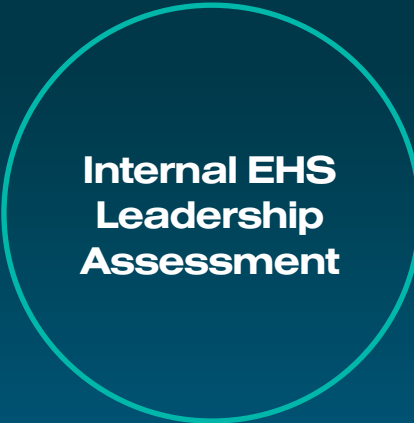
Zero Health & Safety

Zero Environment



Number of Major Non-Conformances

Number of Minor Non-Conformances



Evaluation of Culture Assessment

NB: Metrics measured monthly with attainment measured 31st March each year

## Appendix 1

### EHS Strategy Plan SMART Objectives and Targets 2025 - 2028





## EHS Leadership Assessment

Recognising the role leadership plays in safety, is an integral part of the culture here at Peel Ports Group. Supporting the strategic objectives through embedding, sustaining and continually improving is key to this.

To continue the journey we are introducing an annual leadership assessment, this built around 24 objectives across six key topic areas will enable our Ports to measure their performance and identify those high performing areas and those requiring further improvement.

Details of the annual leadership objectives can be found here....

Number	Category	Target Ref	SMART Objectives	Year 1 25-26	Year 2 26-27	Year 3 27-28	Responsible for Delivery of Target	Measured by
Leadership Objectives	Leadership	1	Monitoring Performance	X	X	X	Port Director	No. of Managing Responsibly meetings (MRM) held by Port Director vs published programme and standard template
		2	Aims and Objectives	X	X	X	Port Director	% of EHS objectives completed by management team
		3	Visible Felt Leadership	X	X	X	Port Director	No of VFL's completed, reviewed and assessed
		4	Employee Briefings	X	X	X	Port Director	3 town hall briefings held in the FY (equally distributed), 1 group and 2 locally determined
	Risk Management	5	Reduction in Injury & Incident Rates	X	X	X	Port Director	% reduction in All Injury Rate (AIR)/Total Recordable Injury Rate (TRIR) and Lost Time Injury Rate (LTIR)
		6	In date Risk Assessments	X	X	X	Port Director	% of risk assessments in date
		7	Permit completion	X	X	X	Port Director	% of permits open vs closed on completion of works
		8	Emergency Drills	X	X	X	Port Director	Number completed in line with published programme
	Incident Investigation	9	Completed Investigations	X	X	X	Port Director	% of 12 step investigations completed within 28 days
		10	Quality of Investigations	X	X	X	Port Director	% completion of Incident Review Panel (IRP) measures
		11	Investigation Tasks/Actions completed	X	X	X	Port Director	% of open vs closed tasks and actions in SAP
		12	Lessons Learnt produced	X	X	X	Port Director	% of Lessons Learnt issued from TRIR and HPCE events
	Assurance	13	Audit compliance	X	X	X	Port Director	Overall % measure of compliance across Level 2, 3 and 4 audits
		14	Completed Level 1 and 2 Audits	X	X	X	Port Director	% completion against the annual programme
		15	Compliance Level 3 Audits	X	X	X	Port Director	% of compliance
		16	Tasks/Actions completed	X	X	X	Port Director	% completed by end of FY
	Employee Engagement	17	Safety Rep meetings	X	X	X	Port Director	No. of safety representative meetings completed vs schedule
		18	Daily start of shift and end of shift briefings	X	X	X	Port Director	Evidence of documented briefings - 12 selected at random
		19	Lessons Learnt briefed and distributed	X	X	X	Port Director	No. of Lessons Learnt issued vs briefed and documented
		20	Reporting of incidents	X	X	X	Port Director	% of incidents open vs closed after 28 days
	Training & Competence	21	Inductions completed	X	X	X	Port Director	No. of workforce vs % completed
		22	Training matrices up to date	X	X	X	Port Director	% of workforce with training matrix vs total workforce
		23	Training completion	X	X	X	Port Director	% of training completed vs overdue
		24	LMS updated	X	X	X	Port Director	% of training records available on LMS vs training completed

Each year is measured 1st April to 31st March

Group EHS Journey to Zero Harm Targets

SYSTEMS, TOOLS AND PROCESSES

Number	Category	Target Ref	SMART Objectives	Year 1	Year 2	Year 3	Responsible for Delivery of Target
1	Evolve and improve our work management package (ATW/PTW) and associated training and assurance requirements	25	Create a Power Bi dashboard accessible to all users to measure % of permits open vs closed on completion of works	X			Group EHS/ IT
		26	Create a Level 1 audit for assessing work management package completion and quality	X			Group EHS
		27	Undertake a full review of the functionality of the work management package and make improvements		X		Group EHS
		28	Review all work management package training modules and make improvements			X	Group EHS
		29	Ensure the work management package is effectively used in each Port Cluster by auditing and ensuring sufficient trained resources are in place to maintain compliance			X	Port Director
2	Deliver the improvements to risk assessment quality through full adoption of Safeguard 3 and ongoing development of improved safe systems of work	30	Create a Power Bi dashboard to measure the % of risk assessments in date across terminals, clusters and Group	X			Group EHS/ IT
		31	Maintain Safeguard 3 and the Risk Assessment Library to ensure all risk assessments are in date	X	X	X	Port Director
		32	Carry out risk assessment training for all personnel who are required to complete risk assessments	X	X	X	Port Director/L&D/Exec Director
		33	Undertake a documented quality assessment of a cross section of risk assessments to ensure they are suitable and sufficient		X	X	Port Director
		34	Undertake a review of the process of completing safe systems of work and create a centralised repository linked to safeguard 3 for managing their review and update			X	Group EHS



Group EHS Journey to Zero Harm Targets

SYSTEMS, TOOLS AND PROCESSES								
Number	Category	Target Ref	SMART Objectives	Year 1	Year 2	Year 3	Responsible for Delivery of Target	
3	Undertake a review of SAP EHS functionality and associated power BI reporting to improve data capture, reporting and analysis	35	Complete a systems review of SAP EHS functionality and identify required enhancements and improvements to support continual system improvement		X		Group EHS	
		36	Undertake a full review of existing Health and Safety Power BI dashboards, create an action plan for improvements and a schedule for update and implementation	X			Group EHS/ IT	
		37	Design a new and improved contractor dashboard with improved data capture and access		X		Group EHS/ IT	
		38	Create an EHS leadership objective dashboard/dashboards to support target delivery	X			Group EHS	
		39	Annually audit the quality of the data in a selection of Group EHS dashboards to ensure continued accuracy	X	X	X	Group EHS	
4	Identify innovative solutions to drive ongoing improvements in EHS performance (group and local level)	40	Undertake an annual EHS leadership assessment (Year 1 benchmark, Years 2 and 3 annual assessment)	X	X	X	Group EHS/Port Director	
		41	Identify an existing or new digitilised platform to improve the communication of EHS materials across the workforce and work with business leaders and safety representatives to effectively roll this out			X	Group EHS/ Marketing	
		42	Create a dashboard for case management, allowing approved managers access to support surveillance, screening and workplace absence line management requirements		X		Group HR/ IT	

Group EHS Journey to Zero Harm Targets

SYSTEMS, TOOLS AND PROCESSES

Number	Category	Target Ref	SMART Objectives	Year 1	Year 2	Year 3	Responsible for Delivery of Target
5	Collaborate with IT and Tech 365 to improve the digital process for managing change incorporating all business areas	43	Review existing processes and systems in place for managing change across Peel Ports	X			Group Engineering/ Group EHS
		44	Following the review establish a cross business working group to develop a documented process for digitilising change management		X		Group Engineering/ Group EHS
		45	Procure or design an in-house system for managing change		X		Group Engineering/ Group EHS/IT
		46	Identify a training package and or provider to design and deliver training to support roll out of the new change management process			X	Group Engineering/ Group EHS
		47	Create a dashboard for tracking change management requests			X	Group Engineering/ Group EHS/Group IT
		48	Design an audit process to ensure the new change management process is being effectively completed and utilised			X	Group Engineering/ Group EHS
6	Maintain an effective EHS management system, ensuring continued cross business compliance	49	Review, update and publish EHS documentation in accordance with the requirements of the EHS management system	X	X	X	Group EHS
		50	Improve the functionality, access and usability of the EHS management system	X			Group EHS
		51	Review, update and report to the EHS management board and ESG committee a 6 monthly risk register	X	X	X	Group EHS
7	Update and enhance EHS content on Peel Ports external facing website and explore opportunities to apply for EHS awards	52	Review existing EHS content on the external facing Peel Ports website and create a design proposal for update	X			Group EHS/Group Marketing
		53	Refresh, update and launch the EHS content on the website based on output from the design proposal		X		Group EHS/Group Marketing
		54	Apply for a minimum of two EHS awards across the three year strategy period (2025-2028)	X		X	Group EHS/Group Marketing



Group EHS Journey to Zero Harm Targets

PEOPLE AND SKILLS								
Number	Category	Target Ref	SMART Objectives	Year 1	Year 2	Year 3	Responsible for Delivery of Target	
8	All business areas will ensure training and competency requirements for EHS are delivered and training matrices are maintained and updated	55	Review existing EHS training matrices and work with learning and development to design a new and improved businesswide version to ensure all employees are captured and have defined EHS training identified	X			Group Learning & Development/ Group EHS	
		56	Establish a process for measuring training completion against the EHS training marix requirements and create improvements to the LMS dashboard to assess % completed vs scheduled	X			Group Learning & Development/ Group EHS/Group IT	
9	All personnel working for and on behalf of Peel Ports will receive a Group EHS and local induction.	57	Create new and improved Group EHS inductions ( 1. Employees and 2. Contractor/Visitor)	X			Group EHS	
		58	Ensure all new employees, visitors and contractors have completed the Group EHS induction before allowing access to site	X	X	X	Port Director/Executive Team	
		59	All existing employees must have completed the updated EHS induction within 6 months of launch		X		Port Director/Executive Team	
		60	A power BI dashboard will be developed to measure induction complete vs incomplete for employees	X	X		Group EHS/Group IT	
10	We will ensure our employee's health and that of third-party labour is protected through effective surveillance, screening, case management and mandatory testing	61	All new employees when joining the business will be drug and alcohol tested, existing employees, third party labour, visitors and contractors will be expected to comply with all requirements of the drugs and alcohol policy which includes pre-employment, for-cause, post incident and random testing	X	X	X	Group HR/Group OH/Port Director	
		62	Undertake an annual assurance audit of third party labour providers to ensure the drug and alcohol policy is being complied with	X	X	X	Group HR/Group OH	
		63	On entry into the business all personnel will be required to complete a health assessment questionnaire, this will be used to assess any ongoing screening, surveillance or health assessment requirements	X	X	X	Group HR/Group OH	
		64	Health surveillance and screening requirements will be assessed based on risk of exposure with scheduled assessments requiring mandatory attendance. An annual target will be set at 95% for completion of surveillance and screening	X	X	X	Group HR/Group OH	
		65	Training on case management and the drug & alcohol policy will be undertaken by all new managers	X	X	X	Port Director/Executive Team	
		66	New employees will receive drug and alcohol policy training and awareness	X	X	X	Port Director/Executive Team	

Group EHS Journey to Zero Harm Targets

PEOPLE AND SKILLS								
Number	Category	Target Ref	SMART Objectives	Year 1	Year 2	Year 3	Responsible for Delivery of Target	
11	We will launch and embed the New Golden Life Saving Rules. Employees, third party labour, visitors and contractors will be required to comply with these when on site	67	All employees,third party labour, visitors and contactors will be required to watch the new Golden Life Saving Rules as part of the Group EHS induction and make a commitment to comply with them	X	X	X	Port Director/ Executive Team	
		68	Existing employees will be required to watch and complete the new Golden Life Saving Rules commitment within 3 months of launch	X			Port Director/ Executive Team	
		69	All sites will remove old Golden Rules posters, signage and other materials and replace these with the new Golden Life Saving Rules to support the launch	X			Port Director	
		70	A power BI dashboard will be developed to measure completion of the new Golden Life Saving Rules and signed commitment	X			Group EHS/Group IT	
12	Core EHS training will be reviewed to ensure it meets business requirements and where possible is standardised across the Group to ensure consistency	71	A complete review will be undertaken of EHS training courses being completed across the Group		X		Group Learning & Development/Group EHS	
		72	Following the review a standardised core list of EHS training courses will be developed in conjunction with the business to ensure all mandatory requirements continued to be covered		X		Group Learning & Development/Group EHS	
		73	We will prioritise our approach to standardising the EHS course provision across the group to ensure consistency wherever possible, these changes will be mandated to prevent the incorrect course being accessed			X	Group Learning & Development/Group EHS	
13	We will develop our safety representative communities through training, active engagement and workplace assurance activities	74	An annual safety representatives (union and non-union combined) meeting will be held each year to deliver key business messages and to listen to workforce feedback	X	X	X	Group EHS/Port Director	
		75	Safety Representatives will receive important EHS messages alongside Peel Ports management team, which will include safety bulletins, lessons learnt, updates to the EHS management system and any other important messages as determined by the Group EHS team and Local Management Teams	X	X	X	Group EHS/Port Director	
		76	All safety representatives will undertake a skills and knowledge assessment to determine any specific training requirements to support the role. For those who achieve the NEBOSH General Certificate in Occupational Health and Safety, they will be paid an additional monthly allowance on completion of monthly level 1 workplace audits (as outlined in the safety representatives charter)	X	X	X	Group Learning & Development/Port Director	



Group EHS Journey to Zero Harm Targets

PEOPLE AND SKILLS								
Number	Category	Target Ref	SMART Objectives	Year 1	Year 2	Year 3	Responsible for Delivery of Target	
14	A review of our Group environmental compliance obligations will be undertaken to improve knowledge and skills across the organisation	77	We will undertake a review of our environmental compliance obligations and create an action plan to target any required improvements or enhancements to our existing Group EHS policies, procedures and processes	X			Group EHS	
		78	A full review will be undertaken of all environmental dashboards to ensure they remain effective in helping the business to manage environmental requirements	X			Group EHS	
		79	A review will be undertaken of all environmental permitting requirements with audits developed to measure compliance obligations		X		Group EHS	
		80	Waste targets will be set annually to drive continual improvements in waste management	X	X	X	Group EHS/ Port Director/ ExecutiveTeam	
		81	A focus will remain on oil spills incidents and near misses with these requiring a 12 step investigation and analysis to identify areas for improvement	X	X	X	Port Directors	
		82	An assessment will be undertaken of existing environmental training to identify any gaps or improvements required. Mandatory training requirements for specific roles will be clearly identified and tracked to completion			X	Group EHS	

Group EHS Journey to Zero Harm Targets

ASSURANCE								
Number	Category	Target Ref	SMART Objectives	Year 1	Year 2	Year 3	Responsible for Delivery of Target	
15	We will enhance and improve our assurance framework working towards self-assured Port Clusters with Group EHS oversight	83	We will publish an annual EHS assurance programme, this will establish the auditing requirements at a site and group level	X	X	X	Group EHS	
		84	Evolving our assurance programme to self assured we will modify the programme each year to allow greater flexibility at terminal and cluster level to determine compliance topics	X	X	X	Group EHS	
		85	Annual Group EHS audits will evolve to become shorter in duration with a greater frequency of smaller spot checks remotely and site based, to ensure continued strong levels of governance		X	X	Group EHS	
		86	Assurance Power BI dashboards will be modified to create a clearer picture of areas of non-compliance and % of open vs closed actions	X			Group EHS/Group IT	
16	Group functions will be fully integrated into the assurance framework with a focus on targeted compliance audits	87	A review of Group functions will be undertaken to identify areas of EHS compliance and those areas requiring improvement	X			Group EHS/Executive Team	
		88	A plan for incorporating the Group functions into the assurance programme will be developed (Year 1), along with any specific audit templates across levels 1 - 3 (Years 1 - 3)	X	X	X	Group EHS	
		89	The annual assurance programme will be updated to incorporate Group functions in line with the plan		X	X	Group EHS	
		90	A quarterly review meeting with Group functions will be held to measure progress against the assurance programme		X	X	Group EHS	
		91	Group functions will be added to the compliance Power BI dashboards		X		Group EHS/Group IT	
		92	An annual statement of compliance aligned to the Group EHS assurance programme for Group functions will be presented annually to the EHS management board and ESG shareholder committee		X	X	Group EHS	
17	Non-compliance will be analysed to identify patterns and poor performance. We will closely track and close actions and tasks raised through our systems	93	We will target zero open major non-conformances from our assurance activities beyond the end of the FY	X	X	X	Port Director/Executive Team	
		94	Group EHS will review assurance data to identify areas of non-compliance and create an annual assurance programme to ensure continual improvements	X	X	X	Group EHS	
		95	Terminals, port clusters and Group functions will ensure actions and tasks are closely managed to ensure closure within 28 days or an action plan with defined timescales is in place to manage any longer term actions to closure	X	X	X	Port Director/Executive Team	



Group EHS Journey to Zero Harm Targets

ASSURANCE								
Number	Category	Target Ref	SMART Objectives	Year 1	Year 2	Year 3	Responsible for Delivery of Target	
18	The Incident Review Panel (IRP) process will be reviewed and enhanced to drive continual improvements in investigation outcomes	96	A review and update of the scoring and quantitative/qualitative criteria for the Incident Review Panel (IRP) will be undertaken to drive continual improvements in incident investigation quality	X			Group EHS	
		97	Near Miss and High Potential Controllable Events (HPCE) incidents will be including in the Incident Review Panel (IRP)		X	X	Group EHS	
		98	Incident Review Panels (IRP's) will be held at terminals and ports monthly with Group reviews being quarterly. The results from the Group IRP will be presented to the EHS management board and ESG committee on a quarterly basis	X	X	X	Port Director	
19	Evolve board and in business reporting to deliver continual improvements in EHS performance, compliance and associated governance	99	Undertake a review of the monthly EHS board report and propose improvements in structure and layout for approval	X			Group EHS	
		100	Review the content of the EHS management board and ESG committee to ensure they reflect both the business needs and track delivery of the EHS strategy		X		Group EHS/Executive Team	
		101	Provide business updates monthly to the Port Operating Board of EHS performance and any actions, requirements from the EHS Management Board or ESG shareholder committee	X	X	X	Group EHS	
20	A set of new performance indicators will be developed to closely measure EHS performance and cultural development.	102	We will publish annually the Group EHS KPI targets and track their performance throughout the year	X	X	X	Group EHS/Executive Team	
		103	An annual statement against delivery of the Group EHS targets will be made in April/May of each year	X	X	X	Group EHS/Executive Team	
21	Group EHS will seek accreditation to ISO 9001, 14001 and 45001	104	A plan will be developed to deliver accreditation to the three ISO standards across Group EHS	X			Group EHS	
		105	All three ISO standards will be achieved at Group EHS level		X	X	Group EHS/Executive Team	
		106	On award of accreditation a review will be undertaken of the annual level 4 cross business assurance activities to ensure they remain appropriate and meet business needs			X	Group EHS	

Group EHS Journey to Zero Harm Targets

GOVERNANCE AND LEADERSHIP								
Number	Category	Target Ref	SMART Objectives	Year 1	Year 2	Year 3	Responsible for Delivery of Target	
22	We will ensure we maintain compliance with all legal EHS requirements	107	Deliver zero enforcement actions by health, safety or environmental regulators in the UK and Ireland	X	X	X	Executive Team	
		108	Maintain all board appointed duty holder positions, hold quarterly duty holder meetings and publish annual declarations of compliance as required by role	X	X	X	Group EHS/Port Director	
		109	Conduct a quarterly EHS legal register review and publish any required updates to the register and EHS documentation	X	X	X	Group EHS	
23	Roles and responsibilities for EHS will be consistently allocated to all employees with targets and objectives clearly stated	110	Create a set of EHS role requirements for inclusion in all job role profiles, roll out and embed these across the business		X		Group EHS/Group HR	
		111	Undertake an annual appraisal of employees measuring performance against EHS role requirements		X	X	Executive Team/Port Director	
		112	Port Director to lead and complete Managing Responsibly Meetings (MRM) in accordance with the Group EHS published programme and template	X	X	X	Port Director	
24	All senior leaders will be required to attend a safety leadership course to support ongoing business cultural change	113	Undertake a review of available courses for safety leadership, work with the provider to align the content to 123 Safety & Me Behavioural Safety training to ensure consistency in safety culture delivery		X		Group EHS	
		114	Identify those senior leadership roles across the organisation requiring the safety leadership training and deliver the training in accordance with an agreed training delivery plan		X		Executive Team/Port Director	
		115	All new senior leaders on joining the business will be required to complete safety leadership training			X	Group HR	
25	Deliver an annual Group EHS/ESG conference focussed on key business themes	116	Deliver an annual EHS/ESG conference for the Group ensuring alignment to the EHS and ESG strategy delivery objectives. Focussed on important themes from the year and also the year ahead	X	X	X	Group EHS	
		117	Annually review the invitees to the EHS/ESG conference to ensure a broad range of internal and external stakeholders are invited to take part	X	X	X	Group EHS	
		118	Create an annual summarised overview of the EHS/ESG conference and deliver this through a town hall briefing to all employees and third party labour	X	X	X	Group EHS	



Group EHS Journey to Zero Harm Targets

GOVERNANCE AND LEADERSHIP

Number	Category	Target Ref	SMART Objectives	Year 1	Year 2	Year 3	Responsible for Delivery of Target
26	Work closely with Port Skills and Safety (PSS) to improve cross sector engagement, improvements in EHS performance, benchmarking and information sharing	119	Support all PSS activities including the Port Safety Group, SIP working group reviews, annual conference and wider engagement activities to drive improved safety across the UK port industry	X	X	X	Group EHS
		120	Share Lesson Learnt and Safety Bulletins with PSS for wider industry learning	X	X	X	Group EHS
		121	Submit monthly incident data returns to PSS, providing wider insight through Power BI dashboards of industry benchmarking	X	X	X	Group EHS
27	Embed the Crisis Management and Business Continuity frameworks to improve business resilience	122	Undertake bi-ennial Group exercises to test the Group Crisis Management Plan and Framework		X		Group EHS/Executive Team/Port Director
		123	Work with all Group functions to ensure they understand their role in supporting the business in the event of a crisis or emergency event		X		Group EHS/Executive Team
		124	Work with procurement to understand the resilience of the top 10 business suppliers and any supplier who is bespoke and cannot be replaced			X	Group EH/Group Commercial
28	Undertake an independent evaluation of EHS systems, tools and processes	125	Submit as required by shareholders monthly, quarterly and annual performance data returns and benchmark performance with other industry sectors by reviewing information shared by investors	X	X	X	Group EHS
		126	Invite the shareholders to conduct an independent appraisal of EHS across Peel Ports group every 3 years			X	ESG Committee

Group EHS Journey to Zero Harm Targets

SAFETY CULTURE								
Number	Category	Target Ref	SMART Objectives	Year 1	Year 2	Year 3	Responsible for Delivery of Target	
29	We will formally measure our safety culture through a workforce survey every 3 years	127	Develop a full workforce Group EHS survey for completion at the end of the 3 year EHS strategy in 2028			X	Group EHS	
		128	Undertake the survey and produce a report summarising the output from the survey, utilising the output to measure improvements in safety culture (Post end of 3 year strategy)			X	Executive Team/Port Director	
		129	Present the findings of the survey to the EHS management board, ESG shareholder committee and via a town hall briefing to the workforce (Post end of 3 year strategy)			X	Group EHS/Executive Team/Port Director	
30	An internal safety leadership assessment will be conducted annually across the Port Clusters to measure performance improvement across a defined range of categories	130	Using the leadership measures identified in targets 1 to 24 in this plan Group EHS will conduct an annual assessment of safety leadership across the port clusters (Year 1 of the strategy will be used to benchmark)	X	X	X	Group EHS/Port Director	
		131	Port Directors will be responsible (annually) for the delivery of the leadership measures as detailed, including maintaining regular review and tracking performance across their area of responsibility, they will also be required to attend the annual assessment (Year 1 of the strategy will be used to benchmark)	X	X	X	Port Director	
		132	A league table will be published annually to measure performance and to delivery consistency and continual improvement (Year 1 of the strategy will be used to benchmark)		X	X	Group EHS	
		133	The Port Director will be required to put a plan in place to deliver improvements into each subsequent year and to communicate the output of the evaluation to all employees through a town hall briefing	X	X	X	Port Director	
31	Our behavioural safety programme will be delivered to all operational business areas by 2027 and embedded into our induction process for new starters	134	Employees will have completed the 123 Safety & Me Behavioural Safety Programme by the start of 2027	X	X		Executive Team/Port Director	
		135	Any new starter will be required to complete the 123 Safety & Me Behavioural Safety Programme within 6 months of joining the business		X	X	Executive Team/Port Director	
		136	Working with our third party labour providers we will agree a roll out plan for the 123 Safety & Me Behavioural Safety Programme and deliver this by 2029	X	X	X	Port Director	



Group EHS Journey to Zero Harm Targets

SAFETY CULTURE								
Number	Category	Target Ref	SMART Objectives	Year 1	Year 2	Year 3	Responsible for Delivery of Target	
32	We will undertake a detailed review of the Visible Felt Leadership (VFL) programme and evolve it to meet strategic EHS objectives	137	A full review of the VFL programme will be undertaken via a cross business working group	X			Group EHS	
		138	The output of the review will be used to design an improved VFL system utilising an improved system platform		X		Group EHS/Group IT	
		139	To compliment the new VFL programme we will design and deliver new training to those personnel who manage or lead people across the organisation		X		Group EHS	
		140	We will create new VFL KPI's and enable improved reporting and action tracking at a local level			X	Group EHS/Group IT	
33	We will work with our procurement team to design a fit for purpose onboarding process for new contractors and define key EHS reporting metrics.	141	Identify a technical solution for onboarding new contractors and suppliers ensuring alignment to the EHS strategy and legal compliance requirements		X		Group EHS/Group Procurement/Group IT	
		142	Incorporate into new and revised supplier and contractor conditions the requirement to submit EHS data on a monthly basis, create an online platform to support this process			X	Group EHS/Group Procurement	
		143	Create a schedule for Group Procurement to undertake EHS assurance audits of key suppliers and contractors to ensure compliance with contractual and legal obligations			X	Group Procurement	
34	Working with our estates team we will develop an engagement framework to support improvements in safety culture across our ports	144	Create an effective process for managing the handover of properties for new and lapsed tenancies to ensure all legal compliance requirements are in place	X			Group EHS/Group Estates/Port Director	
		145	Undertake six monthly VFL's of tenanted properties (determined by Group Estates) to support ongoing improvements in port safety		X		Group Estates/Port Director	
		146	Invite port tenants in each Port Cluster to an annual engagement day to share important information and ideas focussed around EHS		X		Group Estates/Port Director	
		147	Invite a selection of tenants (rotating annually) to the EHS/ESG annual conference			X	Group EHS/Group Estates	

Group EHS Journey to Zero Harm Targets

SAFETY CULTURE								
Number	Category	Target Ref	SMART Objectives	Year 1	Year 2	Year 3	Group EHS/Port Director	
35	Exercising our Crisis Management and Business Continuity plans will form a key component part of our assurance framework	148	Create a Group programme for the terminals and port clusters to test their individual emergency plans	X	X	X	Executive Team/Port Director	
		149	Group functions and port clusters to create a comprehensive suite of Business Contingency Plans to ensure they recover quickly from business interruption. Test the effectiveness of these on an annual rotating cycle to ensure all plans are tested every three years		X		Executive Team/Port Directors	
		150	Work with IT to ensure all Group EHS systems remain robust and can be quickly recovered in the event of a system outage or provider failure	X			Group EHS/Group IT	

The SMART EHS targets which are included in this plan are delivered across a 3 year period, with some spanning each of the 3 years and others a one year deliverable. Delivering these targets will continue our Journey to Zero Harm.

## Appendix II

# Glossary of terms

### Injury Reporting

**All Injury Rate (AIR):**

Our headline safety metric recording all injuries which incorporates Lost Time Incident (LTI), Restricted Workday Incident (RWI), Medical Treatment Incident (MTI), First Aid Injury (FAI) and Minor Injury (MI) and divides these by working hours to create a frequency rate. To ensure we are able to utilise this for benchmarking purposes we factor this to 100,000 work hours.

**Total Recordable Injury Rate (TRIR):**

A key safety metric which incorporates Lost Time Incident (LTI), Restricted Workday Incident (RWI) and Medical Treatment Incident (MTI) and divides these by working hours to create a frequency rate. To ensure we are able to utilise this for benchmarking purposes we factor this to 100,000 work hours.

**Total Recordable Injury (TRI):**

An injury which includes any lost time (LTI), a restriction (RWI) or requires medical treatment.

### Injury Categorisation

**Total Recordable Injury Rate (TRIR):**

All injuries should be recorded once, in the highest appropriate category (see below).

<b>Lost Time Incident (LTI)</b>	An incident that prevents normal and amended duties from being performed for the whole of a future rostered shift.
<b>Restricted Workday Incident (RWI)</b>	An incident that prevents normal duties from being performed on the next rostered shift however the employee is fit for (and given) amended duties.
<b>Medical Treatment Incident (MTI)</b>	An incident requiring treatment beyond the competency of a first aider (e.g. from a doctor, nurse or dentist). Note that a precautionary visit to hospital (including x-ray or scan) does NOT trigger an MTI classification unless additional medical treatment (e.g. stitches) is required.
<b>First Aid Incident (FAI):</b>	An incident requiring treatment by a first aider only.
<b>Minor Injury (MI):</b>	A minor injury that does not require first aid or other treatment e.g. minor cut, bruise or graze.
<b>Non Work Related (NWR)</b>	An incident which has occurred but is not out of or in connection with the work activity. NB An accident is work related if any of the following played a significant role: the way the work was carried out, any machinery, plant, substance or equipment used for the work or the condition of the site or premises where the accident happened.

<b>Fatal Incident</b>	An incident which resulted in a fatality.
<b>Road Traffic Incident (RTI)</b>	A road traffic collision on site which cause injury (injury categorisations must be recorded in EHS SAP as the same as the injury categories of LTI, RWI etc.
<b>Road Traffic Incident Non Work Related (RTI-NWR)</b>	A road traffic collision which has occurred but is not out of or in connection with the work activity or occurs on the public highway.
<b>High Potential Controllable Event (HPCE)</b>	Any type of event that could, in any other circumstances, have realistically resulted in a fatality, multiple fatalities or serious injury. It also includes those events where significant damage could have been caused to the environment and fixed or mobile assets and whereby the reputation and security of the business may have been compromised.
<b>Spill:</b>	Unintentional release of a commodity or chemical from its primary containment.

**Separately from the five injury classifications above, there are parallel definitions and statutory reporting obligations arising from the RIDDOR Regulations 2013:**

<b>RIDDOR Reportable Injury</b>	1. An injury that results in an employee being away from work, or unable to perform their normal work duties, for more than seven consecutive days. This period does not include the day of the incident but does include weekends and rest days. A report of the incident must be submitted to the Health and Safety Executive (HSE) within 15 days.  2. One of the “Specified Injuries” described in the regulations that must also be reported to the HSE regardless of any absence period.
<b>RIDDOR Dangerous Occurrence</b>	An incident falling within one of the 27 ‘Dangerous Occurrences’ described in the regulations. Reports of such incidents must be made immediately by the quickest practicable means and followed up by a written notification within 10 days.
<b>RIDDOR Reportable Diseases</b>	One of the specified “Reportable Diseases” described in the regulations linked to occupational exposure to specified hazards. Reports must be made by the quickest practicable means and followed up by a written notification within 10 days.

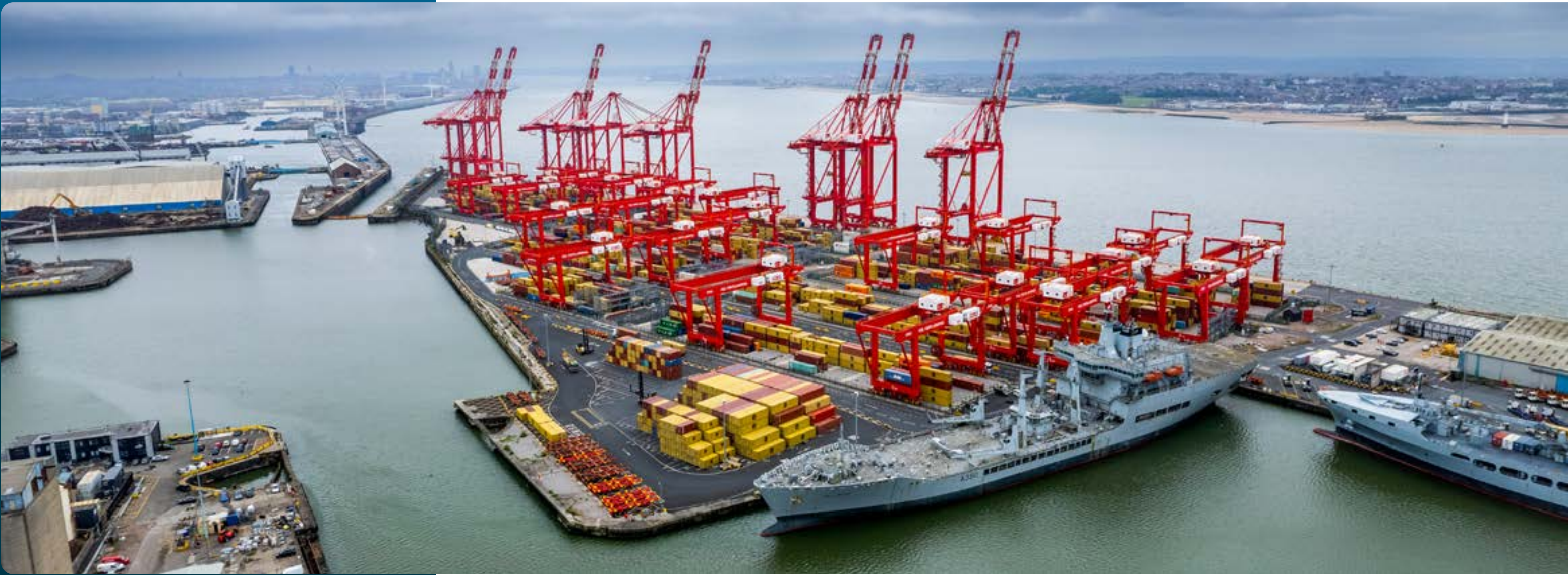


# Group Policies

Peel Ports Group has a range of policies covering environment, health and safety requirements. The policies apply to employees, third party labour personnel, visitors and contractors when working on our sites.

These are reviewed annually and can be found at the **link below** or by scanning **QR code**.

[peelports.com/about-us/health-and-safety/ehs-golden-rules/group-ehs-policies](https://peelports.com/about-us/health-and-safety/ehs-golden-rules/group-ehs-policies)



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